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OCT 04 1999

17 My name is Ginger Swartz and I'm with the Office  
18 of the Governor, Agency for Nuclear Projects. My task today is  
19 to present a statement on behalf of Robert Loux, who's the  
20 executive director of the Office of the Nevada Agency for  
21 Nuclear Projects.

22 The National Environmental Policy Act of 1969 is  
23 our basic national charter for protection of the environment.  
24 Among its purposes, and of great importance, in considering a  
25 high-level nuclear waste disposal site at Yucca Mountain, is

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1 that of fulfilling the responsibilities of each generation as  
2 trustees of the environment for succeeding generations.

3 The NEPA process, of which this Draft  
4 Environmental Impact Statement is a part, is intended to help  
5 public officials make decisions that are based on understanding  
6 of environmental consequences and take actions that protect,  
7 restore and enhance the environment.

8 The environment referred to in the NEPA includes  
9 the human environment, and protection of human health and  
10 safety is implicit in the goals of the Act.

11 The NEPA procedures are designed to ensure that  
12 environmental information is available to public officials and  
13 citizens before decisions are made and before actions are  
14 taken, and the purpose of NEPA regulations is to assure that  
15 federal agencies respond according to the letter and the spirit  
16 of the Act.

17 We're here today because the NEPA regulations  
18 include the requirement that federal agencies hold hearings to  
19 record and then consider the comments of the public on EIS's  
20 they intend to issue.

21 In the Final EIS, agencies must incorporate these  
22 comments or explain why they did not incorporate them.  
23 Agencies must also accept written comments from the public on  
24 the Draft EIS's they issue.

1 25 [ In participating in the NEPA process for the

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1 proposed Yucca Mountain high-level nuclear waste repository,  
2 it's important to remember that this is not just another  
3 federal project.

4           The Yucca Mountain program is entirely  
5 unprecedented in its scope, its time frame, the geographical  
6 area it encompasses as a result of the nationwide nuclear  
7 materials transportation campaign that will be required, and  
8 the nature and extent of the potential impacts associated with  
9 it.

10           Yet this draft document treats Yucca Mountain as  
11 if it were just another dam, pier or road.

12           Given the transportation scenarios contained in  
13 the Draft EIS, rural Nevada communities such as Tonopah,  
14 Goldfield, Beatty and Amargosa Valley could be more heavily  
15 impacted by shipments of radioactive materials destined for  
16 Yucca Mountain than any other communities in the country.

17           That is because two of the proposed rail spur  
18 routes, at least one of the heavy haul truck routes and an  
19 alternative route for legal weight truck shipments would pass  
20 through or very close to all of these communities.

21           All or nearly all of the spent fuel and high-  
22 level waste slated for disposal could be shipped through  
23 northern Nye and Esmeralda Counties.

2

24           According to the Draft EIS, Tonopah, Goldfield  
25 and Beatty are potentially affected by construction and

1 operation of the Caliente and Carlin rail corridors.

2 Either of these corridors could carry up to  
3 19,850 rail shipments of spent nuclear fuel and high-level  
4 radioactive waste to the repository.

5 Maps in the Draft EIS fail to identify the exact  
6 location of the quarter mile wide rail corridors, but do  
7 indicate they could be located within five to eight miles of  
8 Tonopah, within four to seven miles of Goldfield, and within  
9 two to five miles of Beatty.

3

10 The Draft EIS largely ignores adverse  
11 environmental impacts of rail construction and operation on  
12 Tonopah, Goldfield and Beatty.

13 Under certain circumstances, these three  
14 communities would be close enough to the repository rail line  
15 to require evacuation in the event of a severe accident or  
16 terrorist attack.

17 A rail accident or incident releasing radioactive  
18 materials would threaten public health and safety and harm the  
19 local economy.

4

20 Even without accidents, proximity to the  
21 repository rail line could result in adverse socioeconomic  
22 impacts due to public perception of risks and the stigmatizing  
23 potential of the rail corridor.

24 The Draft EIS identifies Tonopah, Goldfield and  
25 Beatty as potentially affected by heavy haul truck shipments,

1 spent nuclear fuel and high-level waste for proposed intermodal  
2 transfer facility at Caliente.

3           There could be up to 19,850 heavy haul shipments  
4 along US 6 and US 95. The Draft EIS assumes an average of  
5 eleven loaded trips per week from Caliente to Yucca Mountain  
6 and eleven return trips of empty casks per week.

7           The analysis of heavy haul impacts is seriously  
8 deficient for several important reasons.

10

9           [First, the document fails to demonstrate the  
10 feasibility of large scale long-term heavy haul shipments of  
11 spent nuclear fuel and high-level waste in large rail casks  
12 weighing 125 tons or more over hundreds of miles on public  
13 highways on a regular basis.

14           The heavy haul transport system proposed by DOE  
15 is completely unprecedented.]

11

16           [Second, the Draft EIS fails to demonstrate the  
17 feasibility of transporting heavy rail casks on 100 to 150 foot  
18 long trailers through Hancock Summit, Tonopah, Goldfield and  
19 other problem areas along the Caliente route.

20           The actual cost of upgrading this route could be  
21 three to ten times greater than the Draft EIS estimate of 120  
22 million dollars.]

5

23           [Third, the document grossly underestimates heavy  
24 haul routine radiation doses to members of the public along the  
25 route, particularly in Tonopah and Goldfield.

1 Stop times and reduced speeds due to  
2 intersections, sharp curves, school zones and other local  
3 conditions could result in significant cumulative exposures  
4 within 150 yards of the highway.

6

5 Fourth, the Draft EIS underestimates the  
6 consequences of severe accidents and terrorist sabotage  
7 incidents involving heavy haul shipments through Tonopah,  
8 Goldfield and Beatty.

9 The close proximity of the highway to hotels,  
10 casinos, retail businesses, schools, churches and residences  
11 would increase human health effects in the event of an accident  
12 or incident involving loss of cask containment or shielding.

13 Proximity to the route would increase the  
14 economic consequences of a heavy haul truck accident or  
15 incident, even one involving no loss of cask integrity.

7

16 Fifth, the Draft EIS ignores the potential for  
17 significant adverse socioeconomic impacts along heavy haul  
18 routes due to public perception of risk and stigma effects.

19 Such impacts could include reduced property  
20 values, reduced income for existing businesses and loss of new  
21 investments.

8

22 The Draft EIS also ignores the potential impacts  
23 on Tonopah, Goldfield and Beatty of legal weight truck  
24 shipments of spent nuclear fuel and high-level waste.

25 US 6 from Ely to Tonopah and US 95 from Tonopah

8 cont'd.

1 to Amargosa Valley are identified as potential State designated  
2 preferred routes in Appendix J.

3 According to the Draft EIS, there could be as  
4 many as 96,000 legal weight shipments to the repository under  
5 the mostly truck scenario.

6 The adverse impacts of these shipments would be  
7 similar to those of heavy haul shipments. The larger number of  
8 legal weight shipments averaging five to ten trucks or more per  
9 day could result in higher routine radiation exposures and  
10 heightened levels of risk.

11 The State of Nevada will be submitting extensive  
12 written comments on this Draft EIS. [It is our hope that these  
13 comments and those of all others will be seriously considered  
14 and that a reasonable no action alternative is selected as the  
15 preferred action in the Final Environmental Impact Statement.]

16 Thank you.

17 MR. LAWSON: Thank you very much.

18 MR. SKIPPER: Thank you for your comment.

19 MR. LAWSON: Our second speaker will be Jamieson  
20 Walker. He'll be followed by Charles Hilfenhaus and Anthony  
21 Guarisco.